From: Tom Young [tcyoung@nwcma.org]
Sent: Thursday, October 01, 2009 12:31 PM

To: COM SBCC Home

Subject: 9-29-09 Written testimony (drawing attached) **Attachments:** Integral Insulated Concrete Masonry Block.pdf



September 29, 2009

Mr. Peter DeVries, Chair Washington State Building Code Council PO Box 42525 Olympia, WA 98504-2525

Mr. Chairman and Council Members:

I am Tom Young with the Northwest Concrete Masonry Association. I, along with others here today, represent the masonry and concrete construction industry in Washington State. We are suppliers/builders of mass (heavyweight) wall systems for the envelope of commercial buildings. Our industry is comprised of many small businesses engaged in manufacturing, distribution, and contracting working together with union labor.

My comments will address portions of the current version of proposed amendment Log # 09-031, specifically the building envelope requirements for nonresidential construction. We strongly **oppose** the mass wall provisions of this energy code amendment. They are potentially very detrimental to the masonry industry and have not been adequately justified. Neither has the need to adopt the proposed amendment been demonstrated by the proponent nor the economic impact evaluated.

This proposed amendment increases masonry wall insulation requirements **240%** in climate Zone 1 and **55%** in climate Zone 2. Additionally, it prohibits the use of integrally insulated concrete masonry block walls (see attached drawing) in Zone 1. This commonly used sustainable wall system provides building owners with a durable-low maintenance interior surface, excellent fire resistance, attractive appearance and maximizes interior square footage.

When analyzing energy use in commercial buildings, it is evident the exterior walls are not the most important item to change when seeking energy savings. They do not have a major impact on the total building energy use. In fact, adding excessive levels of insulation to the mass wall interior as this amendment requires can actually increase the building cooling demand.

This proposal, as it relates to mass walls, is very restrictive and is not cost-effective for building owners. Studies we have conducted show increased construction costs would far

exceed any utility bill savings. There is no reasonable pay-back period provided by this amendment. It would disadvantage our industry.

The current state energy code contains separate mass wall provisions. We support maintaining these requirements and denying the mass wall portion of the proposed amendment.

Thank you for the opportunity to provide comments.

Sincerely,

Thomas C. Young, PE Executive Director

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